UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

JAN 8 1992

MEMORANDUM

SUBJECT: Review of RFA Sampling Plan for Hydrocarbon Recyclers, Inc., Wichita, Kansas

FROM: Robert B. Dona RBDona
Environmental Engineer, QADE/EDSB/ENSV

TO: Mark Matthews
Work Assignment Manager, PRMT/RCRA/WSTM

THRU: Jeffrey A. Wandtke
Regional QA Officer, QADE/EDSB/ENSV

The Sampling Plan for the RCRA Facility Assessment at Hydrocarbon Recyclers, Inc., Wichita, Kansas dated December 31, 1991, that we received from you on that day has been reviewed for adequacy and completeness in accordance with Regional SOP No. 1330.2A. As the objectives of the RFA and the resultant sampling design are undergoing revision, I recommend that the sampling plan be resubmitted when the following comments have been addressed.

1. In Tables 2 and 4 the target compound identified as ideno (cd) perylene does not exist. From Table 1-1 in Appendix B it is evident that ideno (1,2,3-cd) pyrene is intended as the target compound.

2. In the first paragraph on page 8 the method number for mercury is given as 7041 which is the method for antimony, AA furnace technique. Mercury in liquids is analyzed by method 7470 and in solids by method 7471. Also in this paragraph are two references to the phase II FAS where the second reference should be to phase III FAS.

3. The method detection limits in Table 4 for target compounds in extract and water are said to be expressed in mg/l while the ug/l would be more appropriate.

4. Table 5 includes a soil field blank in the sampling series while Section 4.3, QA/QC samples does not include the field blank. I recommend deleting the field blank from Table 5.

5. The Analytical Services Request Form and Table 5 show that BNA extractable organics are request for laboratory analysis. Only polynuclear aromatic hydrocarbons (PAH) are identified as target compounds in Tables 2 and 4. If only PAH are of interest in the soil samples the laboratory resources would be more efficiently used by requesting only PAH analysis.

If you have any questions, please call me at 551-5182.

Attachment

Activity No. QQA49